

Fill in this information to identify the case:

Debtor 1	Derrick Anthony Kuhns aka Derrick A. Kuhns aka Derrik A. Kuhas		
Debtor 2	Staci Ann Kuhns aka Stacey A. Kuhns dba Staci's Cookies, Cakes and Catering aka Stacie A. Kuhns		
(Spouse, if filing)			
United States Bankruptcy Court for the:	Western	District of	Pennsylvania
			(State)
Case number	16-21971 GLT		

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g) the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor:	CITIMORTGAGE, INC./O CENLAR, FSB	Court claim no. (if known):	9-1
Last 4 digits of any number you use to identify the debtor's account:	5646		
Property address:	148 Ritenour Lane		
	Number	Street	
	Latrobe, PA 15650-3929		
	City	State	ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 10/20/2021
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of the response is:

- | | | |
|--|---------|------|
| a. Total postpetition ongoing payments due: | (a) \$ | 0.00 |
| b. Total fees, charges, expenses, escrow, and costs outstanding: | +(b) \$ | 0.00 |
| c. Total. Add lines a and b. | (c) \$ | 0.00 |

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: _____
MM/DD/YYYY

Debtor 1	<u>Derrik</u>	<u>Anthony</u>	<u>Kuhns aka</u>	Case number (if known)	<u>16-21971 GLT</u>
	First Name	Middle Name	Last Name		

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts for the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amount the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

Print	<div>Signature</div> <div>Jill Manuel-Coughlin, Esq. / Harry B. Reese, Esq. / Sarah K. McCaffery, Esq.</div> <div>First NameMiddle NameLast Name</div>	Date	09/20/2021
Company	Powers Kirn, LLC		

If different from the notice of address listed on the proof of claim to which this response applies:

Address	8 Neshaminy Interplex, Suite 215		
	Number	Street	
	Trevose, PA 19053		
	City	State	ZIP Code

Contact phone 215-942-2090 Email bankruptcy@powerskirn.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Derrick Anthony Kuhns aka Derrick A. Kuhns aka Derrick A. Kuhas Staci Ann Kuhns aka Stacey A. Kuhns dba Staci's Cookies, Cakes and Catering aka Stacie A. Kuhns Debtor(s) CITIMORTGAGE, INC./O CENLAR, FSB Movant v. Derrick Anthony Kuhns aka Derrick A. Kuhns aka Derrick A. Kuhas Staci Ann Kuhns aka Stacey A. Kuhns dba Staci's Cookies, Cakes and Catering aka Stacie A. Kuhns Respondent	Case No.: 16-21971 GLT Chapter: 13
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**CERTIFICATION OF SERVICE
OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I hereby certify under penalty of perjury that I served the above captioned parties at the address specified below or on the attached list on September 20, 2021.

The type of service made on the parties (first-class mail, electronic notification, hand delivery or another type of service) was service by electronic notification and first-class U.S. Mail.

Parties served via electronic notification:

Ronda J. Winnecour
600 Grant Street, Suite 3250
Pittsburgh PA 15219
cmecf@chapter13trusteedpa.com
Trustee

Matthew R Schimizzi, Esquire
35 West Pittsburgh Street
Greensburg, PA 15601
mrs@schimizzilaw.com
Attorney for Debtor/Debtors

Parties served via First-Class Mail

Derrick Anthony Kuhns aka Derrick A. Kuhns aka Derrick A. Kuhas
148 Ritenour Ln
Latrobe PA 15650
Debtor

Staci Ann Kuhns aka Stacey A. Kuhns dba Staci's Cookies, Cakes and Catering aka Stacie A. Kuhns
148 Ritenour Ln
Latrobe, PA 15650
Debtor

Dated: September 20, 2021

/s/ Harry B. Reese
POWERS KIRN, LLC
Jill Manuel-Coughlin, Esq.; Atty ID #63252
Harry B. Reese, Esq.; Atty ID #310501
Sarah K. McCaffery, Esq.; Atty ID #311728
8 Neshaminy Interplex, Suite 215
Trevose, PA 19053
Phone: 215-942-2090; Fax 215-942-8661
Email: bankruptcy@powerskirk.com
Attorneys for Creditor/Movant